

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO. H-15-510
	§	
GREGG CARL BAIRD	§	

**DEFENDANT’S UNOPPOSED MOTION FOR AN  
EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS**

TO THE HONORABLE DAVID HITTNER:

Gregg Carl Baird files Defendant’s Unopposed Motion For An Extension Of Time To File Pre-Trial Motions, and for cause would show as follows:

I.

Defendant is charged with receipt of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(B) (count one); access with intent to view child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B) (count two); and possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B) (count three). He is detained pending trial. His pre-trial motions are due on December 4, 2015, and a jury trial is scheduled for January 11, 2016.

II.

The Government and counsel for defendant are engaged in plea negotiations. Counsel is waiting for the prosecutor to send him a written plea agreement, but she has been out of town and indicated that she will not be able to send it until the

week of December 7, 2015. Counsel does not want to file motions and cause the Government to expend its valuable time responding if the case can be resolved without a trial. Accordingly, counsel requests a short extension of the December 4 motions deadline, as well as the Government's deadline to respond. Counsel proposes a new motions deadline of December 18. The Government is not opposed to this extension.

At this time, the parties do not request a continuance of the trial setting but will defer to the Court's judgment whether to do so as a result of extending the motions deadline. Should the parties reach a plea agreement, counsel will notify the Court immediately.

This motion is made in the interests of justice and not to delay the proceedings. Defendant requests that the Court grant this motion.

Respectfully submitted,

/S/ Josh Schaffer

Josh Schaffer

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Attorney for Defendant

GREGG CARL BAIRD

**CERTIFICATE OF CONFERENCE**

I conferred with Sherri Zack, Assistant United States Attorney, on November 30, 2015, and she does not oppose this motion.

/S/ Josh Schaffer

Josh Schaffer

**CERTIFICATE OF SERVICE**

I served a copy of this document on Sherri Zack, Assistant United States Attorney, by electronic filing on December 1, 2015.

/S/ Josh Schaffer

Josh Schaffer

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**ORDER**

Baird's Unopposed Motion For An Extension Of Time To File Pre-Trial Motions is **GRANTED**. Baird's pre-trial motions, if any, must be filed by December 18, 2015.

Signed at Houston, Texas, on December \_\_\_\_, 2015.

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David Hittner  
United States District Judge